

In The United States District Court  
Eastern Division of Pennsylvania

Larry Wisser	)	
And	)	
Cathleen Wisser	)	
Plaintiffs	)	Cause Number 21-5017
Vs	)	
Mr. Bruce Brown Individually	)	
And as Agent for United States	)	
Dept. Agriculture, Trustee Scott Waterman	)	NOTICE
Et Al	)	
The United States	)	
Department of Agriculture	)	
Northwest Bank	)	
	)	<u>JURY TRIAL DEMANDED</u>
John and Jane Does 1-10	)	
yet to be identified	)	
	)	Plaintiffs
Defendants	)	Demand Discovery
	)	

1. USDA's , Bruce Brown's Records, associated with all other Farm and Home financing, foreclosures, credit accounting and loan servicing activities of USDA more than likely reveal NON EXISTENT and FAKED accounting records as in The Wisser matter.
2. All Bruce Brown USDA lending and accounting or loan servicing files and records need to be produced. It appears Fraudulent Accounting and

**Records Management is Routine with Brown and USDA. This Discovery Request will establish the Policy Custom Practice and Pattern of Brown's and USDA's Property Thefts and Frauds like being practiced in the matter of the Wissers. Non EXISTENT Accounting and Servicing Records as in this matter reveal a Very Serious and Fundamental Scam and Fraud in accounting practices . These Records need to be produced in Discovery Demanded.**

- 3. USDA BRUCE BROWN'S Loan Servicing Records and FILES for all loans serviced by Defendant Brown and the USDA involved in loans similar to the loan and financial files to the Wissers.**

### Rule 34. Producing Documents, Electronically Stored ...

LII [https://www.law.cornell.edu/rules/frcp/rule\\_34](https://www.law.cornell.edu/rules/frcp/rule_34)

Similarly, if the discovering party needs to check the electronic source itself, the court may protect respondent with respect to preservation of his records, confidentiality of nondiscoverable matters, and costs. Subdivision (b). The procedure provided in Rule 34 is essentially the same as that in Rule 33, as amended, and the discussion in the ...

### 31 U.S. Code § 3733 - Civil investigative demands | U.S ...

LII <https://www.law.cornell.edu/uscode/text/31/3733>

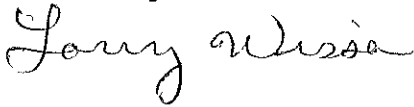
Any such demand or any petition filed under subsection (j) may be served upon any person who is not found within the territorial jurisdiction of any court of the United States in such manner as the Federal Rules of Civil Procedure prescribe for service in a foreign country. To the extent that the courts of the United States can assert jurisdiction over any such person consistent with due ...

## Rule 34. Producing Documents, Electronically Stored ...

[https://www.law.cornell.edu/rules/frcp/rule\\_34](https://www.law.cornell.edu/rules/frcp/rule_34)

The responding party may state that it will produce copies of documents or of electronically stored information instead of permitting inspection.

Larry Wisser



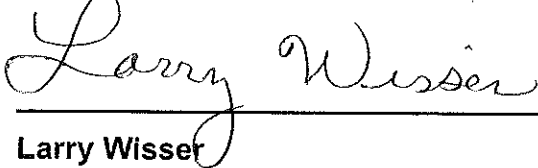
Cathy Wisser



Notary Jurat

I Mr. Larry Wisser and I Mrs. Cathay Wisser herein state that under the Penalty of Perjury the Above Representations and Statements are Accurate and Truthful to the Best of Our Belief and Knowledge.

Mr. Larry and Cathy Wisser after having shown Proof of Their Identities do herewith execute this Affidavit in Connection with the Federal Lawsuit indicated upon this Affidavit. See Attached Records and Statements of Mr. Larry and Cathy Wisser.

  
\_\_\_\_\_  
Larry Wisser

\_\_\_\_\_

Cathy Wisser

*Cathy Wisser*

Respectfully

Larry and Cathy Wisser

*Larry Wisser Cathy Wisser*  
Dated

Address of the Plaintiffs

8149 BAYSCHE ROAD  
NEWTRIPOLI PA 18066

Subscribed and sworn before me, this 18th  
day of Feb, 2022, a Notary Public  
in and for Lehigh County,  
State of PA

*Ruth Miller*  
(Signature)

NOTARY PUBLIC

My Commission expires 4/17 2022

Commonwealth of Pennsylvania - Notary Seal  
Ruth R. Miller, Notary Public  
Lehigh County  
My commission expires April 17, 2022  
Commission number 1112853  
Member, Pennsylvania Association of Notaries

**NOTARY STAMP AND ENDORSEMENT**

**Certificate of Service**

On this Day 2-18-2022 a copy of this AFFIDAVIT was by US Mail sent to  
USDA and Mr. Bruce Brown at the following address. Copy was sent to Mr. Scott  
Waterman at the Address indicated below.

Larry and Cathy Wisser

*Larry Wisser Cathy Wisser*  
DATED  
CHARLES N SHARR JR. ESQ  
3640 WESTVIEW DRIVE  
WYOMISSING PA, 19610  
NORTHWEST BANK ATTORNEY

SCOTT WATERMAN ESQ  
CHAPTER 12 TRUSTEE  
2901 ST LAWRENCE AVENUE  
READING PA. 19606

MATTHEW E. K. HOWATT  
ASSISTANT U.S ATTORNEY  
615 CHESTNUT STREET  
SUITE 1250  
PHILADELPHIA PA, 19106-4476

## NOTARY ENDORSEMENT

Subscribed and sworn before me, this 18<sup>th</sup>  
day of Feb, 2022, a Notary Public  
in and for Lehigh County,  
State of PA

Ruth Miller  
(Signature)

NOTARY PUBLIC

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